

Philip J. Loree Jr. (PL-2213)  
THE LOREE LAW FIRM  
11 Broadway, Suite 615  
New York, New York 10004  
(646) 253-0560  
(516) 627-1720 (alternative phone no.)  
(516) 941-6094 (mobile)  
[PJL1@LoreeLawFirm.com](mailto:PJL1@LoreeLawFirm.com)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
GEO-GROUP COMMUNICATIONS, INC.,

Plaintiff,

Index No. 15-cv-01756  
(KPF)

-v.-

RAVI CHOPRA; MAHENDRA SHAH; VIPIN  
SHAH; 728 MELVILLE PETRO LLC; KEDIS  
ENTERPRISES LLC; JMVD HILLSIDE LLC;  
NYC TELECOMMUNICATIONS CORP.; and  
SHALU SURI,

Defendants.

-----x

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon, and for the reasons stated in, Plaintiff  
Geo-Group Communications, Inc. (“GCI”)’s accompanying Declaration of  
Govind Vanjani Executed on December 6, 2022 (the “V. Dec.”), Memorandum of  
Law in Support of Plaintiff GCI’s Rule 60(b) Motion, and upon all exhibits and  
papers filed in this action, Geo-Group will move this Court on a date  
convenient for the Court, or as soon thereafter as counsel may be heard, for an  
order pursuant to Fed. R. Civ. P. 60(b)(3), 58(a), 58(c), 54(a), and 54(b), and  
the Court’s inherent power:

a. Setting aside the portion of the final judgment in this Action that is in favor of Defendants Ravi Chopra (“Chopra”) and NYC Telecommunications Corp. (“NYC Telecom”) to the extent that the judgment dismissed GCI’s claims against Chopra and NYC Telecom arising out of the \$1,350,000 Jaina transferred to Brog Leninard Green & Genovese, P.C. (now known as Leech Tishman Brog) (“Brog”);

b. Setting aside the portion of the final judgment dismissing GCI’s claims against Chopra and NYC Telecom concerning the \$660,000 Jaina transferred in 2014 to JMVD Hillside LLC (“JMVD”) and 728 Melville Petro LLC (“Melville”) (the “LLC Transfers”);

c. Directing limited, additional discovery concerning the facts Chopra and NYC Telecom, and others, concealed from or misrepresented to GCI and the Court about the true nature of the Brog and LLC Transfers, including, without limitation, facts showing that Chopra, not Impex LTD (“Impex”) or Hillside or Melville, was the beneficiary of those transfers; and

d. After limited discovery directing GCI, Chopra, and NYC Telecom to proceed to trial to adjudicate Chopra’s and NYC Telecom’s liability for the funds transferred to them or for their benefit; and

e. Granting such other and further relief as the Court may deem appropriate.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's November 28, 2022, Order (Dk. 366), answering papers must be served on or before January 6, 2023, and reply papers, if any, by January 13, 2023.

Dated: New York, New York  
December 6, 2022

Respectfully submitted,

By:   
/s/ Philip J. Loree Jr.  
Philip J. Loree Jr. (PL-2213)  
11 Broadway, Suite 615  
New York, New York 10004  
(646) 253-0560  
(516) 627-1720 (alt.)  
(516) 941-6094 (mobile)  
[PJL1@LoreeLawFirm.com](mailto:PJL1@LoreeLawFirm.com)

*Counsel for Plaintiff Geo-  
Group Communications, Inc.*

To: All Counsel of Record and Pro Se  
Parties (via ECF)